



January 19, 2017

Dr. Julie Morris, Chair
Marine Fisheries Advisory Committee
NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910

RE: Next Step for the MAFAC Recommendations on the NOAA Aquaculture Program and
NOAA Fisheries Marine Aquaculture Strategic Plan, 2016-20

Dear Dr. Morris:

The National Aquaculture Association (NAA) appreciates the work by the Marine Fisheries Advisory Committee (MAFAC) to advise, evaluate and recommend priorities and needed changes in NOAA Fisheries national program direction to ensure the Nation's living marine resource policies and programs meet the needs of commercial and recreational fishermen, and of environmental, consumer, academic, tribal, governmental, and other national interests, including commercial aquaculture.

More than a year ago during November 2015, the MAFAC transmitted to NOAA Fisheries extensive comments and recommendations that concerned NOAA's Aquaculture Program and draft Marine Aquaculture Strategic Plan. The Plan was finalized during May 2016.

We request that MAFAC create a biannual review of the actions and deliverables described in the Plan and the several appendices included within the MAFAC transmittal letter. We also request that this review include recommendations to the Office of Aquaculture of additional actions and allocation of resources as those needs become apparent as a result of the review and progress is made. Timely implementation of the Plan and actions described in the transmittal letter will be key to making progress to increase aquaculture production.

Please note that we are not referring to the administrative rule adopted to implement the *Fishery Management Plan for Regulating Offshore Marine Aquaculture in the Gulf of Mexico* and concurrent work completed to develop a coordinated permit process for the Gulf. We are specifically interested in the progress made to achieve Plan action items, deliverables and these items that were included in the transmittal letter:

- Creation of a standardized permit process for short-term aquaculture research to allow the testing and demonstration of technologies in the Exclusive Economic Zone.
- Reduction in perceived conflicts with processing aquaculture project permits that delay timely action by various NOAA offices and programs charged with habitat and species management and protection.
- Adoption of the Plan as an agency-wide guidance document.
- Action to create a Marine Finfish Initiative.

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We also strongly support a suggestion by John Corbin that he offered in his completion report dated April 27, 2016 as retiring Chair of the Aquaculture Task Force. Mr. Corbin recommended as a point-of-reference a paper by Gunnar Knapp and Michael Rubino entitled, *The Political Economics of Marine Aquaculture in the United States*, as a means to monitor NOAA and marine aquaculture progress. Mr. Corbin noted in this letter:

The paper does two things very well: 1) Discusses the current status of the U.S. marine aquaculture industry and the issues constraining its growth, and 2) Offers five broad strategies and describes recent implementation efforts to advance the U. S. industry; namely a) fixing problems, b) creating benefits, c) building partnerships, d) arguing with opponents successfully, and e) reforming governance.

Mr. Corbin closed by stating, “It is recommended that MAFAC use this paper as a ‘Benchmark’ (point of reference) to monitor NOAA and industry progress in the coming years...” We reiterate his recommendation and welcome the opportunity to work with MAFAC to create a dynamic, transparent mechanism to monitor and publicly report on the progress to implement the Plan and the ATF recommendations supported by MAFAC.

We appreciate the considerable and effective work by MAFAC to guide fishery and aquaculture priorities and needs. If there are questions or concerns about our request, please do not hesitate to contact us.

Sincerely,

A handwritten signature in cursive script, reading "James E. Parsons". The signature is written in dark ink and is positioned above the printed name and title.

Jim Parsons
President